



September 27, 2016

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *The Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers*, PS Docket Nos. 15-80 and 11-82; and ET Docket No. 04-35

Dear Ms. Dortch:

On September 26, 2016, Jennifer A. Manner, Senior Vice President, Regulatory Affairs; Hossein Memarsadeghi, Vice President, Consumer Business Management; Patrick Fisher, Senior Principal Architect; and Jodi Goldberg, Associate Corporate Counsel, all of Hughes Network Systems, LLC ("Hughes") met to discuss the above-referenced proceeding with Rear Admiral (ret.) David G. Simpson, Chief of the Public Safety and Homeland Security Bureau ("PSHSB"), as well as with the following members of his Division: Jeffery Goldthorp, Division Chief; Theodore Marcus, Deputy Division Chief; Peter Shroyer, Attorney Advisor; Joseph Schlingbaum, Attorney Advisor; Dana Zelman, Attorney Advisor (by phone); Steven McKinnon, Electronics Engineer; and Megan Henry, Law Clerk.

In the meeting the parties discussed the attached talking points, which discuss Hughes's recommendations for the adoption of metrics that for outage reporting that are more aligned with the capabilities of satellite-provided voice over IP and broadband internet access services.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced docket for inclusion in the public record. Please contact me should you have any questions.



Respectfully submitted,

/s/ Jodi Goldberg

Jodi Goldberg
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Attachment

cc

RADM (ret.) David G. Simpson
Jeffery Goldthorp
Theodore Marcus
Peter Shroyer
Joseph Schlingbaum
Dana Zelman
Steven McKinnon
Megan Henry



Tailoring BIAS and VoIP Outage Reports to Satellite Capabilities in Order to Meet the Objectives of the Commission

I. Overview

- In order to meet the Commission's goal to "ensure reliability of broadband networks used to deploy critical communications services", broadband Internet access services ("BIAS") and voice over IP ("VoIP") outage reporting requirements must be tailored to satellite capabilities and network visibilities to ensure that they remain a valuable tool for the Commission and consumers.

Adopting a throughput-based metric for BIAS outage reporting.

II. Requirements Must Account for Satellite Capabilities and Network Visibility

- Broadband providers cannot report outages originating beyond the networks .
- We wanted a 2 pronged approach: Use minutes for outages within our echo system, and Gbps minutes for problems outside of it. We agreed that Gbps user minutes is not a helpful metric.
- With respect to BIAS outage reporting, measuring latency and packet loss would improperly shift emphasis to service end points, increasing the complexity of the measurement, consuming limited network resources, and offering minimal (if any) additional useful information. The proposed throughput-based metric is straightforward and reflects the ability of customers to use their service.
- The Commission should update the VoIP outage reporting rules to incorporate the same three-step process applied to other services, but should be sure to reflect the unique capabilities of satellite services. A throughput-based metric alone may not be reasonably measured or useful in determining reportable degradation. For satellites, latency (in excess of 1400 ms) and packet loss (in excess of 2.5 percent) will provide useful additional metrics.

III. Conclusion

- Hughes supports the Commission's efforts to increase the dependability of outage reports by broadband service providers, but encourages the Commission to ensure that any measures adopted, (i.e. throughput-based, rather than user-based metrics,

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and latency and packet loss for VoIP only) truly reflect the nature and capabilities of satellite broadband services in order to ensure that the underlying objectives can be met.